

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

BENIGNA CARBAJAL, SHAULAT ALI
CHAUDHRY, MUNEEER HALEEM, DALIA
WILCENSKI, KHALID MAHMOOD, ULISES
ENRIQUE SANTOS LOPEZ, RASHAD RASHEED,
MUHAMMAD KHALID NAZIR, ARIF MEHMOOD,
IMRAN SAEED, MARIA LOURDES LOPEZ
TORRES, JUAN JOSE CASTELANOS,
ALEXANDER TORRES, MUHAMMAD QAMAR
UL ZAMAN, LUBNA QUAMAR, NISAR
CHAUDHRY, EMAD SHAHID QURAISHI,
VRAJESH PATEL, JASBIR BADDHAN, and
WILFIDO VASQUES VALDEZ, individually and on
behalf of others similarly situated,

Plaintiffs,

v.

7-ELEVEN, INC. and CHOE YONG MIN,

Defendants.

Case No. 2:18-cv-03273 (SJF)(AKT)

NOTICE OF MOTION FOR SUMMARY JUDGMENT

PLEASE TAKE NOTICE that, upon the accompanying Memorandum of Law in Support of the Defendant 7-Eleven, Inc.'s ("7-Eleven") Motion for Summary Judgment; the Statement of Undisputed Material Facts Pursuant to Local Rule 56.1 in Support of 7-Eleven's Motion for Summary Judgment; the Declaration of Norman M. Leon, dated September 9, 2019, with supporting exhibits annexed thereto; the Declaration of Daniel Soper, dated September 9, 2019; and the Declaration of Deborah Edwards, dated August 31, 2019, Defendant 7-Eleven hereby moves this Court before the Honorable Sandra J. Feuerstein in Courtroom 1010 of the United States District Court for the Eastern District of New York, 100 Federal Plaza, Central Islip, New York 11722, at a date and time to be determined, for an Order pursuant to Rule 56 of

the Federal Rules of Civil Procedure granting summary judgment in favor of 7-Eleven on all of the plaintiffs' claims asserted against 7-Eleven in the above-captioned action, and granting such other and further relief as the Court deems just and proper.

In accordance with the Court's July 9, 2019 Order, opposition papers and any reply papers shall be filed in accordance with the Individual Rules of Honorable Sandra J. Feuerstein and Local Civil Rules 7.1 and 11.1 of the United State District Court for the Eastern District of New York.

Dated: New York, New York
September 9, 2019

Respectfully submitted,

DLA PIPER LLP (US)

By: /s/ Norman M. Leon
Norman M. Leon

DLA PIPER LLP (US)

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